

AFFIDAVIT OF DETECTIVE BRIAN BALL IN SUPPORT OF DETENTION

I, Detective Brian Ball, state:

Introduction and Affiant Background

1. I am presently a Boston Police Department (“BPD”) Detective, currently assigned to the Boston Police Youth Violence Strike Force (“YVSF”). I have been a Boston Police Officer since 2003 and was promoted to Detective in June of 2015. I am also federally deputized as a Task Force Officer assigned to the U.S. Marshals Massachusetts Task Force. My duties as a Detective and Task Force Officer include evidence collection and analysis and the coordination of investigations both within the YVSF and with outside agencies. I am also responsible for preparing search warrants and assisting with the execution of those warrants. I have participated in numerous state and federal investigations that have resulted in the seizure of firearms and drugs.

2. From 2008 to 2015, I was assigned to the YVSF as a patrolman. My duties during that period involved interacting with and monitoring violent Boston street gangs. I also took part in numerous state and federal investigations targeting Boston gang activity. Upon my promotion to Detective in 2015, I was assigned to the District B-2 Detective Unit where I investigated gang-related shootings and homicides. From 2016 to the present, I have been assigned to YVSF as a Detective and my primary duty has been to initiate and coordinate both short-term and long-term investigations focused on deterring and disrupting gang-related violence. These investigations, both state and/or federal, have often been undertaken in partnership with state and/or federal law enforcement agencies.

3. As part of my experience investigating gangs, I have participated in an investigation involving a gang-related racketeering conspiracy under 18 U.S.C. § 1962(d), as well as other

federal crimes. I have also participated in various other federal investigations involving federal crimes committed by street gang members/associates in the Boston area. These state and federal investigations have required the use of confidential informants/cooperating witnesses, electronic monitoring equipment, surveillance, and search warrants. I have testified in both state and federal court on numerous occasions.

4. The Boston Police Department (“BPD”), the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), Homeland Security Investigations (“HSI”), the United States Secret Service (“USSS”), the Department of Labor (“DOL”), the Internal Revenue Service (“IRS”), the Department of Agriculture (“USDA”), the Massachusetts State Police (“MSP”), the Boston Housing Authority Police Department (“BHAPD”), and the Suffolk County Sheriff’s Department (“SCSD”) have been investigating a criminal organization and street gang known as the “Heath Street Gang” (a/k/a “Heath Street” a/k/a “Heath” a/k/a “Heat” a/k/a “Trottie Gang” a/k/a “Bromley” and/or “Bromley-Heath Projects”) and its members and/or associates for various federal crimes, including, but not limited to, racketeering conspiracy, in violation of 18 U.S.C. § 1962(d). The investigation has established that Heath Street Gang members and/or associates have been and continue to be involved in various crimes, including, but not limited to, murders, attempted murders, robberies, drug trafficking, firearms crimes, obstruction of justice, witness tampering, and financial crimes. The Heath Street Gang’s criminal activities have taken place in several communities in Massachusetts including, but not limited to, Boston, Somerville, Chelsea, Brockton, Weymouth, Dedham, and Worcester. The gang’s criminal activities have also taken place in other states, including Maine, New Hampshire, and California.

5. I am submitting this affidavit in support of the government's motion that the following individuals be detained pending trial: (1) Jaquori Lyons, a/k/a "Gizzle," a/k/a "Y Gizzle;" (2) Joan Avalo-Quezada, a/k/a "Trouble;" (3) Trevon Bell, a/k/a "Moula;" (4) Keonte Campbell, a/k/a "Keko;" (5) Amos Carrasquillo, a/k/a "Cruddy;" (6) Deshawn Cirino, a/k/a "D," a/k/a "Lil D;" (7) Dominique Finch, a/k/a "Heff;" (8) Zion Ford, a/k/a "Bricks;" (9) Tyrre Herring, a/k/a "Blick," a/k/a "Smoov;" (10) De'vonne McDonald-Jones, a/k/a "Daedae," a/k/a "D Jones;" (11) Rickquille McKinney, a/k/a "Ricky Mazarati," a/k/a "Mozzy;" (12) Amani Perkins, a/k/a "Chop," a/k/a "Choppa;" (13) Michael Riley, a/k/a "Snyda," a/k/a "Sneed;" and (14) Keyon Roberson, a/k/a "Beano."

6. These targets have been charged with racketeering conspiracy in violation of 18 U.S.C. § 1962(d). Based on the investigation, all of the listed defendants are members or associates of the Heath Street Gang. I am submitting this affidavit based on my personal observations and review of records, my training and experience, and information obtained from other agents, witnesses, public records, and database checks. This affidavit supports the government's request that the above-listed defendants be detained pending trial. It is provided for the limited purpose of setting forth some evidence concerning the danger presented by the defendants to the community, including the Mildred C. Hailey Apartments.

Background of The Heath Street Gang

7. Multiple federal and state law enforcement agencies have been, and are presently, investigating the criminal activities of the Heath Street Gang. While it is now involved in criminal activities in several different communities and areas, the Heath Street Gang began in what is now known as the Mildred C. Hailey Apartments, a public housing development located in the Jamaica

Plain section of Boston (the “Mildred C. Hailey Apartments” or the “Development”).¹ The Development is one of the largest housing developments in the greater Boston area. The Heath Street Gang was formed in the 1980s. Over the last approximately 40 years, there have been numerous federal, state, and local investigations involving the criminal activities of members/associates of the Heath Street Gang. These investigations have identified that members/associates of the Heath Street Gang commit various crimes (including violent crimes and drug trafficking) and work together to facilitate the commission of these crimes. Based on the ongoing investigation, the Heath Street Gang continues to operate and to engage in a variety of crimes, including, but not limited to, violent crimes (such as murders and attempted murders), drug trafficking crimes, and financial crimes.

8. The Heath Street Gang uses various means of identifying itself and its members/associates. For example, members/associates of the Heath Street Gang use the nickname “Heat” to reference the gang. In this regard, members/associates of the Heath Street Gang also use the Miami Heat NBA team logo as a gang identifier. The Heath Street Gang has also adopted the San Francisco 49ers NFL team logo as an identifier for the gang. The use of this identifier stems from the fact that Heath Street Gang members/associates routinely congregate around 49 Horan Way within the Mildred C. Hailey Apartments. The gang further uses “Jurassic Park” as a means of identifying itself because the name shares its initials (“JP”) with Jamaica Plain, the neighborhood of the Mildred C. Hailey Apartments. Some members/associates of the gang also refer to the Heath Street Gang as being the “Trottie Gang.” Based on investigations of members/associates of the Heath Street Gang, Heath Street Gang members/associates wear

¹ The Development was previously known as the Bromley-Heath Housing Development.

clothing and/or have tattoos of the above-mentioned identifiers to reference the gang and identify themselves as being part of the gang. The Heath Street Gang has also developed several gang hand signs to indicate Heath Street Gang membership/association – some of these hand signs are based on disrespecting rival gangs. Hand signs used by Heath Street Gang members include an “H” hand sign, used as a Heath Street Gang identifier, as well as an “H” symbol using two middle fingers, used as a derogatory hand sign meant to denigrate the rival H-Block Gang.

9. Heath Street Gang members/associates use social media postings and music lyrics/videos to publicly assert and affirm gang membership/association, brag about acts of violence they have committed, and denigrate and threaten rival gangs, including the Mission Hill Gang and the H-Block Gang. In such posts or videos, Heath Street Gang members/associates openly refer to themselves as being part of “Heath,” “Heat,” “Trottie Gang,” and/or “Bromley.” Heath Street Gang members/associates frequently appear in the videos wearing Heath Street Gang clothing, often emblazoned with the Miami Heat and San Francisco 49ers logos, and display gang-related symbols or tattoos such as those related to Jurassic Park.

10. As an example of the use of social media by gang members/associates, defendant Jaquori Lyons has generated social media postings that affirm his Heath Street Gang membership/association. In a series of postings to his Snapchat account in August 2021, Lyons referred to Heath Street as a “hood,” indicating “Heath Street” is the name for the Heath Street Gang rather than simply the name of a Boston housing development. Lyons further bragged that “Heat” was “up,” meaning that the Heath Street Gang was committing more acts of violence than its rival gangs. Lyons also stated that his “hood” was the most active (violent) “hood” and would go to war with any other gang in Boston. Additionally, in a social media post in July 2022, Lyons

(“Trottie YGizzle”) mocked deceased rivals of the gang, and defendant Dominique Finch (“Hennesey Hef”) agreed:



11. Like other gangs in the Boston area, the Heath Street Gang uses rap songs and rap videos to promote the gang (including the gang’s reputation for violence) and to denigrate rival gang members/associates. One of the primary rappers for the Heath Street Gang is defendant Lyons. Lyons has performed in and produced several publicly released rap videos where he raps about specific acts of gang violence (including murders) committed by members/associates of the Heath Street Gang. As an example, in a video released on or about May 2, 2022, Lyons bragged about the Heath Street Gang’s responsibility for specific homicides and non-fatal shootings in the Mission Hill Gang’s territory and surrounding areas. In the video, Lyons rapped about the number of “opps” (rival gang members/associates) that the Heath Street Gang has targeted, but also recognized that mentioning the names of specific, targeted rival gang members could result in law enforcement action: *“I can say they names but I might make the feds come for us.”* This statement did not prevent Lyons from thereafter indirectly referring to homicide and non-fatal shooting

victims in the rap song without expressly identifying the victims by name. One of the references was to F.B., a male who was shot and killed on or about June 7, 2021. The investigation of the Heath Street Gang has identified multiple Heath Street Gang members/associates who were associated with the murder of F.B., including Lyons.

12. In numerous videos, Heath Street Gang members/associates have been observed brandishing firearms.² Several examples follow:



Lyons holding a Glock firearm equipped with a machine gun conversion device (selector switch), with gang-related hand tattoo and wearing two gang-related chains (one memorial chain of a deceased Heath Street Gang member/associate and one “Trottie Gang”).

² On November 16, 2020, BPD officers, while monitoring a Heath Street Gang video shoot, recovered six firearms, all of which were determined to be fully operable, from Heath Street Gang members/associates. The footage from the music video shoot was also recovered, which revealed that several Heath Street Gang members/associates possessed firearms within the Mildred C. Hailey Apartments prior to law enforcement’s interruption of the video shoot. As a result, several Heath Street Gang members/associates, including Jaquori Lyons and Trevon Bell, were indicted for firearms offenses. In connection with this incident, several state search warrants were executed on February 17, 2021, and four additional firearms and distributable quantities of suspected crack cocaine, fentanyl pills, and marijuana were recovered from Heath Street Gang members/associates.

³ Source: YouTube



Joan Avalo, Jaquori Lyons, and Rickquille McKinney, all holding firearms.



Trevon Bell and Keonte Campbell holding firearms.

⁴ Source: YouTube

⁵ Source: YouTube



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Trevon Bell wearing gang-related clothing, holding a firearm, and sitting next to six additional firearms, a box of ammunition, and U.S. currency.



7

Rickquille McKinney wearing gang-related jewelry and gang-related face mask and holding two firearms; Trevon Bell wearing gang-related hat and holding two firearms.

Violence as a Central Precept of the Heath Street Gang

13. The Heath Street Gang has been historically involved in acts of violence, including targeting rival gangs for shootings. Two of the primary rival gangs of the Heath Street Gang are the H-Block Gang and the Mission Hill Gang – both of which are also Boston-based gangs. Over

⁶ Source: YouTube

⁷ Source: YouTube

a period of at least thirty years, the Heath Street Gang has committed numerous murders and attempted murders targeting members/associates of these two rival gangs, as well as other gangs. In turn, the Heath Street Gang has been targeted by their rivals for the same type of violence. This ongoing gang-related violence has continued to the present date.

14. As to the violent nature of the gang, investigators have identified a series of recorded jail calls on or about January 28, 2020, between defendants Trevon Bell (who was incarcerated), Jaquori Lyons and De'vonne McDonald-Jones in which they discussed defendant Keyon Roberson, who was then incarcerated with Bell. In the calls, Bell (who is a leading figure in the gang) raised that Roberson had been denigrating older Heath Street Gang members/associates for not being as violent as younger members/associates. Bell stated: *"He's talking crazy n***a. Like he some big f**king merker [killer] on the street like he bout ... I told him bro like you don't do nothing bro but make a bunch of noise with n****s' shit bro!"* – Bell was referring to the fact that Roberson had not committed a successful shooting on behalf of the Heath Street Gang, but rather had been involved in shootings, using other gang members/associates' firearms, that failed. Bell recounted an interaction he had with Roberson: *"I said Bro ... you done lost four or five of n****s' shits Bro [Roberson had lost four or five firearms on failed shootings]"* Bell further noted that Roberson had failed to physically attack members of rival gangs while he was incarcerated, as was required by the gang. McDonald-Jones stated that he, Bell, and other Heath Street Gang members/associates had been involved in significant violence for an extended period of time:

*What?! And you n****s say we ain't on what? N****a, you must not know n****a. You better go ... you better date all the way back ... n****a till when we was still beefin' [fighting] with the "A" [the Academy Homes Gang] when n****s was tellin' us to chill n****a! In 2011! You better take it back to them days n****a! Almost ten years ago n****a!*

*You n****s ain't on [the] shit we was on.*

15. In a call with Lyons, Bell instructed that Roberson should be sanctioned by (1) Bell physical assaulting Roberson while they were being held, and (2) Roberson being prohibited from returning to the Heath Street Gang or the Mildred C. Hailey Apartments until Roberson completed a successful shooting. Bell stated: “*On dogs, he [Roberson] better not come back out there [the Mildred C. Hailey Apartments] until he ups something*” – i.e., commits a murder.

16. McDonald-Jones and Bell also discussed McDonald-Jones meeting with an older member of the gang based on this issue involving disrespect by younger members/associates regarding claims that older members of the gang were not sufficiently violent. McDonald-Jones informed Bell that McDonald-Jones had gone to the older member’s “building” in the Mildred C. Hailey Apartments to have the meeting. McDonald-Jones explained that he and the older member had a heated discussion over the disrespect. Per McDonald-Jones, during the meeting, tensions escalated to the point that another older member approached McDonald-Jones from behind with a firearm on his person.

Recruitment of Juveniles into the Heath Street Gang

17. Investigators have identified that the Heath Street Gang is actively involved in the recruitment of individuals (commonly juveniles) to join the gang and to participate in crimes on the gang’s behalf, including shootings. The large size of the Mildred C. Hailey Apartments provides a pool of numerous younger individuals who can potentially be recruited by older Heath Street Gang members/associates. BPD officers have observed younger individuals being recruited into the Heath Street Gang up to the present date – these observations have occurred in person and through communications/ postings on social media. Parents have also raised concerns with the

BPD about their children being recruited into the Heath Street Gang. In fact, defendants Joan Avalo-Quezada (“Avalo”) and McDonald-Jones discussed concerns that they had with parents attempting to pull their children out of the Heath Street Gang. McDonald-Jones told Avalo: “*These other little boys runnin around ... their moms is talking about calling Jakes [slang for the BPD] on n****s and shit ... like huh? Postin’ them on the internet ... like crazy shit*” As an example of this point, in 2023, BPD officers were asked by the mother of two juveniles to assist her in removing her children from the Mildred C. Hailey Apartments, specifically from interacting with Lyons and other Heath Street Gang members/associates. The juveniles were removed from the Development and were walked to an adjacent grocery store parking lot. As the officers were speaking with the mother and her children, defendant Amos Carrasquillo, using his cellular phone, began to record the officers interacting with the mother and children. Carrasquillo, still recording, approached closer and began to verbally assault the officers, yelling loudly in what was perceived as an attempt to draw attention to them. Carrasquillo was informed by the officers that, were a video to be publicized showing the juveniles interacting with law enforcement, it would likely result in the juveniles being targeted for intimidation and potential assault. Carrasquillo acknowledged this likelihood but continued to record the officers, mother, and her children.⁸

18. Between August and September 2020, investigators identified multiple recorded jail calls between Lyons and other Heath Street Gang members/associates in which they discussed gang recruitment and issues related to recruitment. In one of the calls, it was discussed that Bell had seven new recruits for the gang. Several days later, Bell told Lyons that “we grabbed this little

⁸ In a similar vein, on numerous occasions, Heath Street Gang members/associates have intimidated and assaulted BHA officers during the commission of their duties at the Development. Some of these incidents have resulted in officers suffering injuries.

n***a that used to be from Creston, he just left Creston [Creston Street Gang].” In another recorded jail call with Bell, Lyons disparaged gang members who were not recruited into the gang until the age of 18 or 19. Lyons stated that “by 18, 19, my mind was up n***a ... n***as is 12 and 13 in this shit [referring to being in the gang at 12 and 13 years of age].”

19. Criminal activities for juvenile recruits and members/associates often include (1) acting as a lookout while older members/associates carry firearms and/or sell drugs, and (2) holding weapons and/or drugs for members/associates. As an example, defendant Bell was arrested in 2020 for unlawful possession of a firearm inside a hallway of the Mildred C. Hailey Apartments. While in custody, Bell placed a recorded jail call to defendant McDonald-Jones on January 15, 2020. Bell indicated to McDonald-Jones that younger Heath Street Gang members/associates were in trouble for not alerting Bell to the presence of law enforcement. McDonald-Jones asked Bell why Bell had not ordered younger recruits or members/associates to cover the hallway doors. In a recorded jail call on September 14, 2020, Lyons confirmed that he uses younger gang recruits to commit crimes for him (including carrying firearms):

*That’s why when you see me, I kept two, I got two hooda n***as on me. I kept Lou and I kept Dre. And they had it n***a. You f***in got me f***ed up. I don’t wanna hang around n***as that don’t have it. F*** y’all talking about, I’m out here on a bracelet [GPS monitor], on my third one ... ride around, eh, I’m done man.*

20. Juvenile recruits and members/associates are also involved in acts of violence on behalf of the gang, including committing shootings. In this regard, Heath Street Gang members/associates have openly commented on the violent role played by the juveniles recruited into the gang.

21. One of the primary recruiters of juveniles into the gang and into the gang’s violence, is Lyons. As noted previously, Lyons is one of the leading Heath Street Gang rappers and has

been involved in the production of several gang-related rap songs and rap videos. Investigators have identified that the gang uses appearances or mentions in rap songs and rap videos (particularly Lyons's raps and videos) as a means of recruiting juveniles to join the gang and commit gang-related crimes, including shootings. Lyons has been clear that he expects that juveniles will become involved in gang-related violence, especially shootings. Lyons was questioned on this topic on a 2022 podcast (in which Lyons and other Heath Street Gang members/associates participated from what appeared to be a building in the Mildred C. Hailey Apartments). The host asked: "So do u think the older n****s use the younger n****s to do the shit they ain't gonna do?" [referring to gang-related violence]. Lyons responded:

*It's not "use" ... It's not "use" ... 'Cause they partly did it ... Every generation's got shooters in every generation ... These little n****s wanna gang bang ... they gonna gang bang regardless, so we're gonna show u how to do it. That's how it all be in a gang/game ... most of the time it's the little n****s that wanna spin [commit a shooting] every day. You wanna spin [commit a shooting] every day? ... Y'all know the consequences? Alright, I hope you know the consequences. At 13 and 14, they don't give a f**k. 17, 18, 19, then you start getting street smart ... n****s are going to jail ... 13 and 14 we ain't have that.*

22. Multiple younger Heath Street Gang members/associates are currently under investigation or have recently been arrested for committing acts of firearm violence against rival gang members. Many of these individuals were frequently seen in the company of Lyons and other Heath Street Gang members/associates. The practice of older gang members requiring younger prospective gang members/associates to commit acts of violence as an act of initiation is not unique to the Heath Street Gang and is commonly seen in other Boston gangs. The particular tactic employed by Lyons and other Heath Street Gang members, rewarding younger members with appearances in Heath Street Gang music and/or videos, is somewhat unique.

23. Moreover, once younger individuals are recruited into the gang, it becomes exceedingly difficult to leave because of the ongoing violence between gangs. Individuals marked as gang members face the threat of constant retaliatory violence from any number of rival gangs, and thus, in many cases, cannot leave the gang. In a different 2022 podcast, Lyons (who was with other Heath Street Gang members/associates) summarized this fact: “... *Ain’t no such thing as retired gangsters. You gonna die a gangster. Gangsters don’t retire bro.*”

24. The gang’s practice of using younger members to commit crimes on behalf of the gang is longstanding. For example, a social media post by a Heath Street gang member/associate in which he appears standing next to defendant Dominique Finch references putting the younger member/associates [i]n position” as he and Finch are “gettin older” and having the younger member/associates “run the jectz” [referring to the Development]:



Heath Street Gang Criminal Activities

Violent Crimes

25. Based on the ongoing investigation, the following are some of the violent crimes in which the defendants and other members/associates of the Heath Street Gang are implicated.

Murder of J.K. on or about August 27, 2016

26. On or about August 27, 2016, at approximately 3:33 a.m., victim, J.K., was shot and killed outside of a 7-Eleven convenience store on Centre Street in Jamaica Plain. The victim was shot multiple times at close range right after he exited the 7-Eleven with some food items. The shooter was observed by witnesses and briefly caught on camera – the shooter was observed wearing some type of light-colored cloth over his head to conceal his facial features.

27. The investigation developed evidence which supports that defendant Amos Carrasquillo was involved in drug trafficking within the Mildred C. Hailey Apartments and that he became involved in a drug-related dispute with another individual involved in drug dealing at the Development. The evidence supports that this conflict led to an ancillary dispute between Carrasquillo and the victim, J.K.

28. Officers recovered video evidence from various cameras in the area of the murder. Investigators identified two suspect vehicles. The first vehicle was a 2003 white Toyota Matrix, which was associated with defendant Amos Carrasquillo. The second vehicle was a 2017 white Ford Fusion sedan, which was associated with another Heath Street Gang member/associate. Based on recovered security video, these two cars were observed multiple times driving in a manner consistent with being involved in the murder of J.K., including conducting surveillance of J.K. leading up to the murder. In addition, prior to the murder, defendant Carrasquillo was

observed with a light-colored cloth item consistent with one worn by the shooter to conceal his identity.

Shooting in Rival Gang Territory on or about October 9, 2016

29. On October 9, 2016, at approximately 1:02 a.m., a nine-year-old female victim was shot and severely injured in an area associated with the Mission Hill Gang while she was attending a family gathering. Recovered security video identified two hooded males as the shooters.

30. Investigators have identified evidence that supports the shooting involved at least two Heath Street Gang members/associates – defendants Michael Riley and Dominique Finch. As a part of the evidence, investigators identified that, at that time, Riley was driving a grey/silver Saturn ION – a similar vehicle was used by the two hooded shooters. At the time of the shooting, Finch was on state-ordered GPS monitoring. The GPS evidence for Finch supports that he was operating a white vehicle associated with the shooting based on a comparison of his GPS data with security camera footage from the area of the shooting around the time of the shooting. The white vehicle and Saturn were recorded driving past the site of the shooting prior to the shooting – consistent with conducting surveillance. Shortly after this first pass, video footage showed the two shooters (who were driving in the grey/silver Saturn ION) meet with the white vehicle in a nearby parking lot. The two vehicles thereafter drove back to the area of the shooting. The two hooded men exited the Saturn and committed the shooting while the white vehicle stopped nearby – consistent with acting as a support vehicle. Shortly after the shooting, one of the firearms used in the shooting was recovered from Michael Riley's girlfriend. The second firearm used in the shooting was recovered from a Heath Street Gang member/associate after officers observed it in the possession of defendant Lyons during a social media posting.

Shooting on the Grounds of the Mildred C. Hailey Apartments on or about December 9, 2016

31. On or about December 9, 2016, approximately two months after the shooting of the nine-year-old victim, BPD officers responded to a shooting at the Mildred C. Hailey Apartments involving a victim who was working in the area of the Development. The victim had been in a physical confrontation with two males. One of the males pulled a handgun and shot the victim. The victim was severely injured in the shooting. Investigators obtained security video of the incident. The shooter was identified as wearing a light-colored hoodie, a dark jacket, red pants, and tan boots. Officers also recovered security video from a nearby liquor store. Video from the liquor store captured a clear image of the face of a man in a light hoodie, dark jacket, red pants and tan boots (consistent with the shooter) before the shooting. Law enforcement officers, who were familiar with defendant Michael Riley, identified that the man in the light hoodie, dark jacket, red pants and tan boots as Riley. Investigators further identified video footage of defendant Riley entering a building in the Development shortly after the shooting wearing a light-colored hoodie, a dark jacket, red pants, and tan boots.

Firearm Seizure on or about December 7, 2019, Connected to Attempted Shooting

32. On December 6, 2019, BPD officers were on alert due to an uptick in violence involving the Heath Street Gang and Mission Hill Gang. The date was also associated with the two-year anniversary of the murder of a Heath Street Gang member allegedly by the Mission Hill Gang – anniversary dates of murders often result in retaliatory violence. At approximately 1:56 a.m. on December 7, 2019, officers observed a grey vehicle driving in Mission Hill Gang territory. The vehicle ran a red light and thereafter fled at high speed when officers attempted to stop it. The vehicle crashed into a pole and various individuals were seen fleeing from the vehicle.

33. Officers arrested the driver of the vehicle, defendant Zion Ford. Officers recovered a loaded Glock 17 9mm pistol from Ford's person. The pistol was then analyzed by law enforcement and determined to have a lead to a shooting within the Mildred C. Hailey Apartments less than two months prior (as well as an earlier shooting in Brockton in 2016). Officers observed the front passenger of the vehicle, later identified as defendant Amani Perkins, appear to grab something from the backseat area before appearing to throw it back and fleeing. Perkins was subsequently caught and arrested by the officers. Officers recovered a loaded Glock 23 .40 caliber pistol in the backseat area of the vehicle consistent with Perkins grabbing the pistol and then discarding it in light of the responding officers. This pistol was also analyzed by law enforcement and determined to have a lead to a shooting in Mission Hill Gang territory in December 2018. Defendant Keyon Roberson was also arrested after the crash. While receiving medical treatment for claimed injuries from the crash, officers heard Roberson confirm with a treating physician that he had been in a car crash and in the backseat of the car – the area where the Glock 23 was located.

34. On or around January 24, 2020, in a recorded jail call, Roberson was admonished by a more senior Heath Street Gang member/associate for acting recklessly and being caught by the police. In the call, Roberson responded that the senior member/associate was being disingenuous because: "You know what the day was" (i.e., the two-year anniversary of the Heath Street murder). Thus, Roberson was arguing that he and the other two members/associates were justified in seeking to commit a retaliatory murder targeting the Mission Hill Gang on the anniversary of the prior murder. The senior member/associate responded that Roberson had to know that the police would be on alert and that he could have done the shooting on another day to

avoid the extra police diligence. The member/associate further told Roberson that Roberson had to act in a more deliberate fashion to avoid being caught.

Shooting in Rival Gang Territory on or about August 10, 2019

35. Based on the ongoing investigation, investigators have developed evidence that defendant Amos Carrasquillo and Heath Street Gang member/associate R.P. were involved in an attempted murder targeting the Mission Hill Gang on or about August 10, 2019, at approximately 12:39 a.m. At that time, BPD officers responded to the area of Albert Street and Prentiss Street for an initial report of shots fired which was supplemented by a ShotSpotter activation at 58 Albert Street for 12 shots. Albert Street is in Mission Hill Gang territory. Officers subsequently recovered approximately 12 shell casings in the area of 58 Albert Street. Based on the investigation, officers identified that three individuals (who appear to have been associated with the Mission Hill Gang) were involved in a gun battle with two other individuals. Approximately 20 minutes after the shots were fired, Carrasquillo was brought to the Boston Medical Center for a gunshot wound to his upper thigh. Officers determined that he had been brought to the hospital by R.P. and a female associate. When interviewed by police, R.P. did not provide any useful information about the actual shooting but did admit that he had been present at a city-sponsored basketball tournament the previous day.

36. In a jail call between Jaquori Lyons and Trevon Bell at approximately 3:49 p.m. on August 10 – later in the day of the shooting –, Bell informed Lyons about a run-in between Heath Street Gang members/associates and Mission Hill Gang members/associates and Orchard Park Gang members/associates, which took place at a city-sponsored basketball tournament on August 9th – the day before the shooting. Bell identified several Heath Street Gang members/associates

who got into a heated argument with members/associates of the two rival gangs, including defendants McDonald-Jones and Keonte Campbell. Per Bell, Campbell was armed and drew his gun as the dispute grew more heated. Bell noted that no violence occurred at the tournament due to a large police presence and the presence of the Mayor of Boston. Lyons then asked Bell: “So what ... so what? N****s go over the Park? [referring to targeting the Orchard Park Gang for a shooting].” Bell responded: “Nah.” Lyons asked: “The Hill? [referring to targeting the Mission Hill Gang for a shooting].” Bell replied: “The Hill ... Crunchy cr...” Lyons stated: “I wanna know who got the [unintelligible].” Bell stated: “Um ... couple. Bro ... I can’t ... it’s so crunchy I can’t even say. No bulls***, it got crunchy” – Bell was likely cognizant of the fact that the call was recorded and they were discussing a gang-related shooting. Lyons responded: “Somebody’s outta here?” – referring to someone being killed. Bell replied: “No. It got crunchy. Just know it got real crunchy” – Bell was referring that the attempted shooting had gone wrong. This call is consistent with Carrasquillo and R.P. being the “couple” who had been on the “crunchy” mission against the rival gang which resulted in Carrasquillo being shot and taken to the hospital.

Shooting in Rival Gang Territory on or about April 23, 2020

37. On or about April 23, 2020, around approximately 2:50 a.m., a shooting took place on Holworthy Street in Boston, which is considered rival H-Block Gang territory. The timing of the shooting was confirmed through ShotSpotter activations. Investigators found multiple expended shells as well as ballistic damage in the area of 58-60 Holworthy Street. The recovered ballistic evidence supports that individuals were shooting at each other on that street.

38. At approximately 3:01 a.m., approximately 10 minutes after the shooting, a member/associate of a gang associated with the Heath Street Gang was brought to a nearby hospital

suffering from a gunshot wound. He was brought to the hospital by defendant McDonald-Jones and defendant Tyrre Herring (who has been identified as a Heath Street Gang member/associate per the investigation) in a black 2017 Honda Accord associated with McDonald-Jones. Law enforcement officers at the hospital took photos/video images of: (1) the Accord; (2) the clothing worn by the other gang member/associate; and (3) the two Heath Street Gang members (McDonald-Jones and Herring), including the clothing they were wearing. Investigators thereafter recovered various pieces of video evidence from the area surrounding the shooting. The video evidence supports that McDonald-Jones drove Herring and the other individual to the area of the shooting and dropped them off. Herring and the individual then walked into H-Block Gang territory and were involved in a shooting. The video evidence further shows that the two fled from H-Block Gang territory and were picked up by the vehicle driven by McDonald-Jones.

Shooting/Felony Murder on or about January 6, 2021

39. On January 6, 2021, at 749 Morton Street in Boston, L.N was shot and subsequently died due to his injuries. Based on the investigation, L.N. was shot during a Heath Street Gang ambush of rival gang members/associates. Defendants Amani Perkins and Zion Ford were involved in the shooting. As set forth above, Perkins and Ford were arrested approximately a year before this event attempting to do a shooting in Mission Hill Gang territory with Keyon Roberson.

40. Investigators have gathered evidence tying defendants Perkins and Ford to the shooting including video evidence. The evidence supports that Perkins and Ford (along with two other individuals) set-up an ambush on Morton Street using a location near 749 Morton Street. The evidence shows that three individuals (who have been associated with the Orchard Park Gang) walked towards the area of the ambush. Shots were thereafter fired from the area where Perkins,

Ford, and the other two individuals were lying in wait. The shots were fired by two separate firearms, including a 9mm pistol. Perkins' phone was recovered from the area where ballistic evidence from the 9mm firearm was recovered. The evidence supports that four individuals (including Perkins, Ford, and L.N.) returned to the area of 749 Morton Street in the immediate aftermath of the ambush. The evidence supports that L.N. was shot (likely by mistake) by the 9mm pistol used in the ambush. This 9mm pistol was recovered approximately one month later during the execution of a state search warrant of a residence used by defendant Lyons.

Murder of F.B. on or about June 7, 2021

41. At approximately 8:41 p.m., on June 7, 2021, a male victim, F.B., was shot and killed in rival Mission Hill Gang territory. Based on evidence generated by the ongoing investigation, a juvenile member/associate of the Heath Street Gang committed the murder; this juvenile has been tied to multiple gang-related shootings involving other Heath Street Gang members/associates. This juvenile member/associate of the Heath Street Gang has been charged in state court with the murder.

42. The evidence supports that the murder of F.B. involved multiple Heath Street members/associates playing various roles. Based on GPS data and security video data, defendant McDonald-Jones (who drove in tandem with defendant Lyons for a period of time) drove the juvenile shooter at the onset of the incident. The evidence also supports that McDonald-Jones traveled to an area from which he could observe the murder scene after the shooting had taken place consistent with his conducting post-shooting surveillance. The evidence further supports that defendants Campbell and Avalo acted as getaway drivers for the juvenile shooter after the

murder and drove the shooter to a Quincy residence used by another Heath Street Gang member/associate.

Armed Robbery on or about November 7, 2021

43. On November 7, 2021, at approximately 7:00 p.m., a male victim reported to the BPD that he had been lured to a Boston location through internet communications where he was robbed of his property by multiple armed individuals in at least two vehicles. Per the victim, he was robbed of his wallet, iPhone and the keys to the BMW that he was driving. The robbers then forcibly took the victim to the victim's apartment and made the victim get two of the robbers into the apartment where the victim's mother and brother also lived. The victim was able to flee the apartment and call the police. The two robbers also fled.

44. BPD subsequently identified one of the robbers to be a Heath Street Gang member/associate. This gang member subsequently pled guilty to state charges related to the robbery and kidnapping and is presently incarcerated. Both the gang member and defendant Keyon Roberson were being monitored by GPS on the date of the incident. The GPS data for the two establishes that Roberson's movements and location were consistent with him being involved, along with the identified gang member, in the armed robbery.

Shooting in Rival Territory on or about May 11, 2022

45. Based on evidence, including video surveillance footage, various Heath Street Gang members/associates were involved in a shooting in rival Mission Hill Gang territory on or about May 11, 2022, at approximately 7:50 p.m. Three juveniles were involved in the actual shooting. The three juveniles traveled to Mission Hill Gang territory from the Mildred C. Hailey Apartments on a scooter. Defendant DeShawn Cirino provided the scooter for the shooting. A

bystander in the Mission Hill Housing Development was hit in the lower leg during the shooting. Based on video evidence from the BHA, numerous other Heath Street Gang members/associates also met with the juveniles before and after the shooting, including Jaquori Lyons, Keyon Roberson, and R.P. (the individual involved in the prior shooting with defendant Amos Carrasquillo). On July 25, 2022, defendant Cirino was stopped operating the white scooter he previously provided to the three juveniles to use in the shooting. Cirino was wearing a shirt with a “Trottie Gang” logo, one of the Heath Street Gang’s identifiers.

Trafficking in Controlled Substances

46. I am aware that members/associates of the Heath Street Gang have been investigated and prosecuted for drug trafficking crimes over a period of multiple years. The investigation has identified that Heath Street Gang members/associates have established, and work together, to maintain drug distribution networks throughout Massachusetts, California, and Maine.

47. The Heath Street Gang uses the Mildred C. Hailey Apartments as a locus for some of the gang’s drug trafficking activities. As an example of this, from February 2023, through approximately March 2023, Lyons obtained multiple deliveries of cocaine and cocaine base from a drug source (known as “Ace”), which Lyons indicated were for distribution in the Mildred C. Hailey Apartments. Based on the communications, Lyons conspired with Ace to distribute a significant cocaine and cocaine base (as well as marijuana) during this short period.

48. For example, on February 16, Lyons texted: “Duce for 16” – based on the communications, this was a reference to 62 grams of cocaine for \$1,600. “Ace” responded by asking for payment upfront for 31 grams. Lyons subsequently offered a “band” [\$1,000] for “those two thangs” and that he would pay “6 on the back end” – meaning that Lyons would front \$1,000

and pay the remaining \$600 after he sold the drugs. After the delivery of the drugs, “Ace” sent Lyons the following communications: “I gave u 62 right cuzzo?” and “If it was off a couple grizzys [grams] lmk I’ll bring it next time I see you” On March 7, 2023, Lyons sent a text asking for another 62 grams and promised to pay “2200” – which breaks down to the price for the 62 grams plus the \$600 that Lyon’s owed for the prior delivery. Lyons also asked for a “zip up front if u can bro” – based on the investigation, this was a request for another 31 grams to be fronted by “Ace.” “Ace” agreed to do so. Lyons thereafter texted that he had to delay the delivery because he “cheffed” it wrong and had a problem selling it – i.e., Lyons tried to manufacture cocaine base but his product was not properly made. “Ace” responded that he would provide Lyons with “a 62 of hard and watch how your trap take off” – i.e., he would sell Lyons cocaine base to improve Lyon’s drug business. Lyons thereafter replied that his customers were “lovin’ it.” In the later stages of this period, the two agreed to larger quantities of cocaine and cocaine base. On or about March 27, 2023, Lyons sent the following communication to “Ace”: “I’m trynna help you help me take over the jects [referring to the Mildred C. Hailey Apartments] it’s a goal mind out here bro” – investigators believe that “goal mind” means “gold mine.”

49. Evidence supports that Lyons continued to distribute controlled substances in the Development in 2023 until his arrest in May 2023 on federal charges (Lyons was arrested pursuant to this investigation to prevent his continued recruitment of juveniles into the Heath Street Gang). As an example, on May 23, 2023, using security cameras, BHA police officers observed what appeared to be a drug transaction take place in an interior stairwell of one of the buildings at the Development. The individual who appeared to be the customer in the deal was disabled and confined to a wheelchair. At approximately 2:00 p.m., a BHA officer observed a Heath Street

Gang member/associate) wheel the individual in the wheelchair to the entrance of 287 Centre Street. The individual proceeded into the building alone and then proceeded to a stairwell area on the first floor. The officer observed the individual meet with Lyons briefly in the stairwell before leaving through the security camera system. The officer viewing this action on video believed that the conduct was consistent with hand-to-hand drug transaction. The officer proceeded to the location as did another officer. The first officer observed the individual who was believed to have been the drug customer. The officer also observed the individual snort a tan powdery substance off the individual's closed fist. As the officer approached, the officer observed the individual to have a plastic baggie in his right hand. The individual threw the baggie into his mouth and swallowed it. The officer asked what the individual swallowed and the individual replied "opiate." The officer asked if it was fentanyl, and the individual nodded his head. The officer called for emergency medical assistance due to concerns for the individual's health. The officer asked why the individual had fentanyl and the individual replied to the effect: "It's medicine. They give it to me so that I feel well." As the individual made this statement, he motioned towards a group outside of the location. The officer observed the group to include Lyons, as well as other individuals identified per the ongoing investigation as Heath Street Gang members/associates.

50. On May 25, 2023, officers executed a state warrant for an apartment at 270 Centre Street, Jamaica Plain. The apartment used by Lyons and his girlfriend. This apartment overlooks the Mildred C. Hailey Apartments' grounds. Officers recovered: (1) approximately \$1609.00 in US currency; (2) a small amount of powder fentanyl; (3) a blue fentanyl pill marked "M 30" – consistent with the pills seized from Lyons and other Heath Street Gang members/associates; (4) a small amount of cocaine base; (5) drug trafficking paraphernalia such as mixing bowls and digital

scales with drug residue on them; and (6) various rounds of ammunition, including a box of 53 .22 caliber rounds hidden in a Oreo cookie box in the kitchen (which was accessible to the children in the apartment).

51. Defendant Joan Avalo was arrested on December 14, 2021, in Boston for trafficking in fentanyl after BPD officers stopped Avalo and another individual in possession of approximately 69 grams of suspected fentanyl. The fentanyl was recovered inside a magnetic “hide” box pursuant to a traffic stop. During this encounter, officers seized two telephones from Avalo, one of which was hidden in Avalo’s pants. Investigators subsequently sought and were granted search warrants for the seized phones. The phones’ contents revealed that Avalo traveled regularly to Maine to supply distribution quantities of fentanyl and cocaine to individuals engaged in drug distribution.⁹ The majority of the communications with these dealers were arrangements to collect drug-related debts, orders for specific amounts and types of drugs, and attempts to recruit new dealers for the drug network. It was also discovered that other Heath Street members/associates assisted Avalo in the Maine drug operation, often by driving Avalo from Boston to Maine to collect money and distribute illegal drugs. Avalo was also involved in the distribution of marijuana at the Mildred C. Hailey Apartments and worked with other Heath Street Gang members/associates, including defendant Dashawn Cirino in this distribution of marijuana.¹⁰

⁹ Similarly, defendant Amani Perkins was arrested in Maine in 2022 in a residence with another individual. The two were arrested after officers received information from an individual who lived at the residence that Perkins and the other individual were armed and distributing drugs. Officers were able to use a video camera in the residence and observed Perkins and the individual armed with a large handgun. The disassembled handgun, along with a distributable amount of drugs, were subsequently recovered from the residence by Maine law enforcement officers.

¹⁰ On June 13, 2022, an MSP trooper stopped a white Toyota Rav4, which had Joan Avalo, as the driver. The trooper conducted a query of Avalo’s license, which confirmed that it had been

52. Based on the ongoing investigation, Heath Street Gang members/associates often uses social media platforms to facilitate the distribution of controlled substances. In April of 2023, investigators observed social media posts by several Heath Street Gang members/associates promoting Joan Avalo's marijuana distribution operation. Using an undercover social media account, investigators contacted Avalo directly and confirmed that he was using his social media account to advertise, negotiate, and arrange the sale of illegal narcotics. Similarly, in January 2024, investigators recovered social media postings involving defendant Dominique Hines and another Heath Street Gang member/associate in which the two advertised high-end marijuana for sale.¹¹

53. As noted herein, one of the controlled substances distributed by the Heath Street Gang is fentanyl. The fentanyl is distributed by the Heath Street Gang in powder form as well as in the form of pressed pills which are manufactured to appear as prescription oxycodone pills. These fentanyl pills are often made with blue cutting agents to mimic the color of oxycodone pills and will sometimes have markings pressed into the pills that are consistent with commercially-

suspended on December 13, 2021, for failure to pay fine and costs in New Hampshire. The trooper prepared to tow the vehicle and conducted a motor vehicle inventory search. During the search, the trooper located ten large plastic bags containing a significant amount of marijuana hidden in boxes in the trunk. The drugs were seized. At the time of this stop, Avalo was on pre-trial conditional release following a December 14, 2021, arrest for trafficking fentanyl.

¹¹ Other Heath Street Gang members/associates are involved in this type distribution of an expensive brand of marijuana commonly referred to as "Cali-Bud." Cali-Bud is often described as "designer" marijuana due to its high potency, unique packaging, and high monetary value. Based on the investigation, this marijuana is obtained in California. Heath Street Gang members routinely post offers on social media applications to sell this type of marijuana. On October 28, 2021, law enforcement arrested defendant Jaquori Lyons and another identified Heath Street Gang member/associate for drug and firearm charges following a motor vehicle stop in Somerville in which officers recovered a loaded 9mm firearm and a distributable quantity of "Cali-Bud" marijuana, packaged for sale, from the vehicle, along with over \$7,000 in United States currency.

manufactured oxycodone pills. While fentanyl is more potent than oxycodone, it is a cheaper drug. Fentanyl pills made in this manner reap a greater profit because oxycodone pills are more expensive on the street. Investigators have recovered documents and electronic communications that establish that Heath Street Gang members and associates work together to distribute fentanyl, including in this pill form, using social media applications and street-level sales. Investigators have recovered communications from multiple Heath Street Gang members/associates, including defendants Tyrre Herring and Amani Perkins, in which they discussed selling these fentanyl pills made to appear like oxycodone pills.

54. On or about February 17, 2021, BPD officers executed a state search warrant at an apartment used by Jaquori Lyons located at 145 Millet Street, Apartment #3, Dorchester, MA. An officer posted outside observed that, at or about the time that officers attempted initial entry into the apartment, a male came to one of the apartment's windows, opened the window and the screen on the window, and was holding something in his hand. The officer thereafter flashed a light into the window to see what the male was attempting to do. The male backed away from the window. The only male in the apartment was Lyons. Officers subsequently searched the room where Lyons was observed at the window with an object in his hand and seized a loaded handgun from under a couch in the room. The handgun was a 9mm Beretta semi-automatic pistol, bearing serial number X468312, which was loaded with 9mm ammunition and had a round in the chamber of the pistol. This 9mm pistol has been associated with the shooting of L.N. discussed above. Officers also searched a bedroom in the apartment that was identified as being used by Lyons. Officers also seized (1) a plastic baggie with approximately 19 blue pills which were marked "M" on one side and "30" on the other side, and (2) a plastic baggie containing an off-white substance. The pills

were field-tested and the results were consistent with the presence of fentanyl. The off-white substance was also field-tested and the results were consistent with the presence of cocaine base. In a social media posting on or about September 10, 2021, Lyons posted a video of a bag with approximately 20 blue pills consistent with the pills recovered from the apartment and included the phrase “Get Your/ Money Up/ Not The/ Funny Up.” A still photograph from that video follows:



Further, in a social media posting on or about July 11, 2022, Lyons posted a video of a bag filled with blue pills consistent with the fentanyl pills seized on February 17, 2021, with the words “They Here.”

55. These counterfeit pills pose an additional danger to the community as they may contain lethal amounts of fentanyl or methamphetamine, but look identical to legitimate prescription pills. Many of these pills are manufactured and produced in other countries, however, they are also produced by domestic drug trafficking organizations using pe-made chemicals and drugs from other countries, in labs with subpar conditions, by amateur manufacturers, i.e. drug dealers, with no chemistry training and no quality control mechanisms to ensure dosing is not lethal. Below are examples of authentic prescription medications compared to counterfeit pills that illustrate just how authentic the counterfeit pills appear.



Left: Authentic oxycodone M30 tablets (top) vs. counterfeit oxycodone M30 tablets containing fentanyl (bottom). Center: Authentic Adderall tablets (top) vs. counterfeit Adderall tablets containing methamphetamine (bottom). Right: Authentic Xanax tablets (left) vs. counterfeit Xanax tablets containing fentanyl (right). Source: DEA Drug Fact Sheet

Financial Crimes and Organized Retail Theft

56. Based on the investigation, since at least approximately 2019, an organized retail theft group involving members/associates of the Heath Street Gang has openly and brazenly stolen merchandise from various stores in Massachusetts and New Hampshire. During the thefts, the involved individuals openly take merchandise, sometimes directly in front of store associates. When confronted by store associates, the individuals often become belligerent, make threats, and at times, engage in acts of violence. The individuals then leave with the merchandise without

providing payment. Based on the investigation, these thefts constitute one of several fraudulent methods of generating illicit income by members/associates of the Heath Street Gang.

57. As part of the investigation of the Heath Street Gang, multiple suspected fraudulent CARES Act unemployment claims were identified. These claims include multiple claims for the same claimant with altered social security numbers (“SSNs”) reported to DUA, multiple claims filed by claimants in states other than Massachusetts, and/or the submission of suspected fraudulent employment letters from a company, Married 2 The Mop Cleaning LLC (“M2M”), owned and operated by individuals associated with the Heath Street Gang. According to Commonwealth of Massachusetts records, on or about September 17, 2020, M2M was organized by defendant Rickquille McKinney. Per Commonwealth of Massachusetts records, prior to its December 29, 2023 state-ordered involuntary dissolution, M2M was owned and operated by Rickquille McKinney. Pursuant to the investigation, investigators have identified that Rickquille McKinney and his wife are members/associates of the Heath Street Gang. Per the investigation, and as further detailed below, M2M was used by the Heath Street Gang and numerous members/associates to commit various crimes, including fraudulently obtaining CARES Act monies, and to facilitate criminal activities, including by providing cover employment. Indeed, in one rap song, Trevon Bell brags: *“I bought a hundred guns with this PUA.”*

58. The investigation has identified at least twenty-three (23) DUA PUA claims, which received a total of over \$917,000 in benefits, that submitted nearly identical M2M letters in an effort to meet the PUA eligibility requirement of proving attachment to the Massachusetts labor market. A review of these PUA claims identified multiple notations by DUA employees responsible for reviewing and adjudicating issues on the claims noting concerns about the

legitimacy of M2M and/or the M2M letters. In multiple PUA claims, DUA identified these letters to be suspected as fraudulent, including based on the fact that M2M was not registered with the Commonwealth of Massachusetts until September 2020 – after the date these PUA claims were filed.

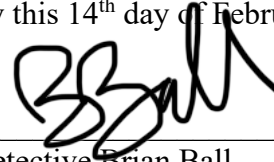
59. In addition to the above financial crimes, members/associates of the Heath Street gang also engaged in Paycheck Protection Program (“PPP”) fraud. The CARES Act authorized the payment of PPP loans to small businesses and non-profits for job retention and other work-related expenses. Multiple members/associates of the Heath Street Gang falsified PPP loan applications and tax documentation, alleging that they owned businesses that did not exist. In addition to providing personal identifying information, the members/associates took “selfie” photographs to confirm their identities as part of the application process. In one circumstance, investigators learned three members/associates of the Heath Street Gang submitted paperwork alleging that they each owned the exact same photography business with the same gross receipts, expenses, and net profit. The three members/associates also brazenly submitted the same falsified tax documentation, with different identifying information, to support their loan applications.

60. After receiving the loan amounts into bank accounts, members/associates often would spend the amounts immediately through ATM withdrawals, transfer of the amounts through mobile applications such as CashApp or spend the money on non-business-related expenses, such as shopping, casino visits, luxury restaurants, and bills. In some circumstances, some members/associates depleted the PPP loan amounts in their bank accounts on non-business expenses as quickly as weeks after loan disbursement.

CONCLUSION

61. For the reasons set out above, I respectfully request that the above-listed defendants be detained pending trial.

Signed under the pains and penalties of perjury this 14th day of February 2024.

A handwritten signature in black ink, appearing to read 'B. Ball', is written over a horizontal line.

Detective Brian Ball
Boston Police Department